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**UNITED STATES BANKRUPTCY COURT** 2015 AUG -6 PM 2:22  
District of Maryland

**U.S. BANKRUPTCY COURT  
DISTRICT OF MARYLAND  
BALTIMORE**

	DISTRICT OF MARYLAND BALTIMORE
NATIONSTAR MORTGAGE LLC	<b>Case Number: 15-15219</b>
Movant	<b>Chapter 7</b>
v.	
Herdisene McIntyre Green	<b>Objection to Amended Motion For</b>
Respondent	<b>Relief From Automatic Stay</b>
GEORGE LIEBMANN	
CHAPTER 7 TRUSTEE	

**OBJECTION TO AMENDED MOTION FOR RELIEF  
FROM AUTOMATIC STAY FILED 07/20/15**

**COMES NOW, Respondent, Herdisene McIntyre Green, with the following objections to Movant's Motion for Relief From Automatic Stay.**

### Moyant's claims:

1. No objection to jurisdiction.
  2. No objection to statement converted to Chapter 7.
  3. No objection to George Liebmann as Chapter 7 Trustee.
  4. **Objection. How can you own a piece of property when you are holding it under a leasehold? I don't think such is possible. Further, as stated in the previous objection, Sherry Properties, Inc. did NOT convey the lot of ground to Respondent, Herdisene McIntyre Green. Sherry Properties, Inc. did an assignment of rights and interests in the lot of ground and buildings thereon, subject to a non-expiry lease with semi-annual payments of \$60.00. Respondent, Herdisene McIntyre Green, pays "ground rent" to Sherry Properties, Inc.**

5. **Objection.** Movant has not made original documents available for examination so that Respondent, Herdisene McIntyre Green, can determine their authenticity.
  6. **Objection.** Respondent, Herdisene McIntyre Green, denies that she owes any debt to Movant..
  7. **Objection.** Movant has refused to validate the alleged debt. Respondent, Herdisene McIntyre Green, denies being in default on any debt.
  8. Objection. Same as #7.
  9. Objection. Same as #7. Also, what is the alleged cause of the dissipation of equity in the alleged Debtor's residence. No evidence has been entered to show a dissipation.
  10. Objection. Movant offers no evidence to support its claim that Movant continues to be irreparably injured by the stay. How is loss of revenue an irreparable injury? Loss of revenue, the only injury Movant can possibly be suffering is not irreparable.
  11. Objection. Movant has failed to show cause upon which relief can be granted.

Furthermore, Respondent, Herdisene McIntyre Green, has and continues to make the Court aware that Respondent is a disabled person and is covered by the provisions of the Americans with Disabilities Act. Movant has not addressed that fact, even though Respondent believes them to be knowledgeable of such fact. Before this Court can grant a Relief from Automatic Stay, it must first schedule an accommodation hearing for the Respondent, in which hearing Movant must provide a detail summary of how Respondent will be accommodated in the removal of Respondent from her property.

Additionally, Respondent, Herdisene McIntyre Green, motions this Court, that in the event it decides to lift the Automatic Stay, that this Court will issue an Order in the form of a

1 The Movant, NATIONSTAR MORTGAGE, LLC, cannot be allowed to sell the property and  
2 yet still keep the Promissory Note and the profits earned therefrom, because that would be  
3 unjust enrichment. Furthermore, the Promissory Note and Deed of Trust are the chattel  
4 property of Respondent, Herdisene McIntyre Green, and must be returned.

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6 **VERIFICATION**

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8 I, Herdisene McIntyre Green hereby states, declares, verifies and affirms under penalty  
9 of perjury, under the laws of the United States of America and the State of Maryland, that I,  
10 Herdisene McIntyre Green, have read the foregoing and know the ~~contents~~ thereof; that the  
11 same is true and correct based on the undersigned's own knowledge to the best of the  
12 undersigned's current information, knowledge, comprehension and belief.

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14 Dated: 1 day of August, 2015

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17 Herdisene McIntyre Green

18 Herdisene McIntyre Green

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**In re: Case No. 15-15219 Chapter 7  
Herdisene McIntyre Green  
Debtor**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true copy of the Response to Objection to Confirmation, filed by Herdisene McIntyre Green, has been sent to the parties listed below via USPS pre-paid First Class Mail on July \_\_\_\_\_, 2015.

**Copies Mailed to:**

**NATIONSTAR MORTGAGE  
8950 Cypress Waters Blvd  
COPPELL, TX 75019**

**Mark D. Meyer, Esq.  
Rosenberg & Associates, LLC  
7910 Woodmont Avenue, Suite 750  
Bethesda, Maryland 20814**

**GEORGE LIEBMANN  
CHAPTER 7 TRUSTEE  
8 West Hamilton Street  
Baltimore, MD 21201**

Dated this 31 Day of July, 2015

## **Herdisene McIntyre Green**

## **Objection to Relief From Automatic Stay**